

1 WorldCom. I was wondering if I could get a copy
2 of your 20-page --

3 MR. MAXWELL: Certainly.

4 UNIDEN. SPEAKER: If you order the
5 service.

6 (Laughter)

7 MR. BROWN: We can leave it here
8 and you can put it on the record.

9 MR. MASON: That's fine.

10 MR. SRINIVASA: You're not going
11 to leave the modems?

12 MR. MAXWELL: Right.

13 MR. SRINIVASA: It's only the
14 documents --

15 MR. MASON: Since you've opened
16 the box, you might as well just leave them.

17 (Laughter)

18 MR. MASON: Okay. Thanks very
19 much. We can turn to the technical publication,
20 but I understand we had a request to speak about
21 something.

22 MR. DRUMMOND: For the record,
23 Eric Drummond of Casey, Gentz & Sifuentes on
24 behalf of Rhythms Links. Rhythms Links filed
25 their list of issues late. While they were in

1 the process of negotiating with Southwestern
2 Bell, discussing a resolution of the CFA issues
3 that we discussed at our past workshop, that --
4 apparently that discussion went late in the day
5 on the day that -- Wednesday, July 19th, that we
6 were required to file a list of issues.

7 In the process of waiting for
8 resolution of that and to get some documents
9 back and information back from Southwestern
10 Bell, the time expired for the filing of it.
11 Some discussions and investigation pursued the
12 next day, and, finally, when it became clear
13 that the issue wasn't going to be resolved,
14 Rhythms Links was able to gather their list of
15 issues together and we filed it on Friday.

16 Bell filed a letter saying that they
17 were opposed to it; and although in their letter
18 they didn't address any reasons why other than
19 the fact it was late-filed, we filed a short
20 letter basically stating that there were --
21 several of the issues were issues we had already
22 been discussing at our last workshop, and,
23 actually, were issues that Bell had committed,
24 as I remember, to discuss again when we came
25 back together, and that, in fact, although it

1 was two days late-filed, it appeared to us that
2 they would have enough notice for us to be able
3 to address those issues at this workshop.

4 So our request is that we be able to,
5 time permitting, take up the issues that Rhythm
6 Links filed along with Covad, IP and WorldCom.

7 MR. LEAHY: Tim Leahy for
8 Southwestern Bell. To the extent that the
9 issues listed by Rhythms in its late-filed
10 document were already addressed or expected to
11 be addressed because they were open from the
12 prior meeting, we would not oppose addressing
13 those. However, the point of the seven-day
14 notice is to give us an opportunity to prepare.
15 And the fact that -- it's true that the parties
16 meet on a regular basis. We meet twice a month
17 to address Project Pronto issues. We meet twice
18 a month to address line sharing. We have
19 conference calls every week on loop qual, for
20 instance.

21 So we're meeting all the time, but
22 their comes a point in which we need to get
23 notice as to what issues are expected. We
24 strongly request that that seven-day notice be
25 adhered to.

1 Having said that, to the extent that
2 the Rhythms issues -- that we have people here
3 who can address it, of course, we will address
4 it. To the extent that we don't, we'll just try
5 to get back to the parties.

6 MR. MASON: Okay.

7 MR. GOODPASTOR: Chris Goodpastor
8 on behalf of Covad. With respect to Covad's
9 issues, they're a little bit different from
10 Rhythm's and haven't really been addressed in
11 this forum before and haven't necessarily been
12 addressed by SBC in other contexts. To the
13 extent we like -- thus, we sympathize with
14 Mr. Leahy's claim that they may not have the
15 right people here. So with respect to Covad's
16 issues alone, being completely different from
17 IP's issues and Rhythm's issues, we're willing
18 to put that off until the next session.

19 MR. SRINIVASA: So you don't have
20 the subject matter experts to address Covad's
21 issues today?

22 MR. LEAHY: Well, we have a couple
23 of problems with Covad's filing. First of all,
24 it was late and it was very detailed. But, from
25 our review of it, it appears to be an issues

1 list for arbitration or, perhaps, issues that
2 are already being addressed at the FCC in the
3 context of Project Pronto. I don't know that we
4 need to resolve that right now, but we do have a
5 dispute as to whether this forum is the
6 appropriate forum to address the Project Pronto
7 details such as those raised by Covad in its
8 filing last Friday.

9 But in any event, my sense is that
10 we've agreed not to address it today, and we
11 don't have all of our Project Pronto people
12 prepared to address those issues, and many of
13 them aren't here, of course.

14 MR. GOODPASTOR: We think the
15 issues that we put in the issues list are
16 separate and apart from the FCC filing dealing
17 with the transfer of assets. So, you know,
18 taking no position on that, we think that these
19 issues are something that are appropriate for
20 this forum. Although the parties have discussed
21 these informally in meetings and things like
22 that, we think that the prospect to resolution
23 is probably a little bit greater here in this
24 forum than in sort of informal meetings. So we
25 request it be teed up for the next workshop.

1 MR. MASON: Yeah, I think -- the
2 seven-day notice is there for a reason, and I do
3 understand that. So, I mean, please get these
4 things on time. I mean, they do need notice to
5 come answer these things. And I do appreciate
6 to the extent that you do have the subject
7 matter experts here, I would like to address, to
8 the extent we can get to them, Rhythm's issues.
9 I think -- I do think that almost all of them
10 are from sort of previous discussions, so it's
11 not much of a surprise, and I appreciate that.

12 But I guess to the Pronto -- you know,
13 staff is interested in this topic, and it's kind
14 of hard to flesh out where the overlap is, and
15 there is no demarcation point that we can just
16 say, "Well, that's outside the box and this is."
17 I think we are -- we're interested in the Pronto
18 architecture and the remote terminals on a
19 going-forward basis. So I don't think we're in
20 a position here to say we're not going to talk
21 about that in the DSL working group.

22 I mean, I think it's gone well in the
23 past. I understand there's other forums. We're
24 not -- and I understand the invitation to
25 participate in those, although it appears to be

1 more of a carrier-to-carrier type trying to work
2 out process improvement. So I think from a
3 policy standpoint it would be helpful to discuss
4 these things here, and, actually, when we get
5 done here today, I think Nara and I are
6 interested in possibly scheduling another DSL
7 forum or working group fairly soon to discuss
8 some of -- some more remote terminal issue type
9 Pronto architecture.

10 So that's sort of where I am. We can
11 discuss any concerns you have when we get the
12 next issues list, if that's okay.

13 MR. LEAHY: That's fine.

14 MR. GOODPASTOR: Thank you, Your
15 Honors.

16 MR. DRUMMOND: For the record, we
17 do appreciate any burden that it places on
18 Southwestern Bell to receive those issues late,
19 and we will endeavor to get those in on time.

20 MR. MASON: Okay. With that I
21 think we can take up the technical publication
22 issue.

23 MR. GOODPASTOR: Your Honors,
24 Covad didn't have an opportunity to file written
25 comments on this; however, we do have some short

1 oral comments I would just like to make as part
2 of the process. I just want to make that clear.

3 MR. SIEGEL: Are there any -- are
4 we going to be (inaudible) --

5 MS. MALONE: It was filed in the
6 docket.

7 MR. SIEGEL: This docket?

8 MR. LEAHY: Yeah, it was filed in
9 the implementation docket.

10 MR. LEAHY: I think it's Order No.
11 11.

12 MS. MALONE: Let's go off.

13 (Off the record discussion)

14 MS. MALONE: We'll now turn to the
15 discussion of Tech Pub 76860 TX. It was noticed
16 in both Project 20400 and Project 21165 that we
17 would be discussing this particular tech pub
18 today. It was also mentioned at the last DSL
19 working group in June that we would be
20 discussing Tech Pub 76860 TX today.

21 To start off, I want to clarify that
22 I'm going to ask Southwestern Bell, we are
23 particularly looking at Issue No. 8, which has
24 an effective date of May 2000. That's the
25 particular issue of the tech pub that you're

1 seeking approval of?

2 MR. SMITH: Yes.

3 MS. MALONE: Therefore, Issues 1
4 through 7 are not being used or implemented in
5 any way?

6 MR. SMITH: No, they're not.

7 MS. MALONE: Has any spectrum
8 management or binder group management or any
9 other sorts of management issues that were in
10 the previous issues of the tech pub -- has
11 everything surrounding that been dismantled?

12 MR. SMITH: I can't answer to the
13 outside plant portion of spectrum management. I
14 can say that all spectrum management references
15 were removed from the tech pub as per the
16 orders.

17 MS. CHAPMAN: This is Carol
18 Chapman with Southwestern Bell. I can address
19 that. And, yes, all spectrum management has
20 been dismantled.

21 MS. MALONE: I think how we're
22 going to start this off is the Staff has some
23 questions about the tech pub, and we'll go
24 through those quickly and then decide how to
25 proceed from there. So do you want to start,

1 Raj?

2 MR. RAJAGOPAL: Good afternoon.
3 This is Raj for the record. I'm from TIA. A
4 question to Southwestern Bell, Tech Pub 76860,
5 in Page 31, references Tech Pub 76625, which is
6 the DSL percent availability and acceptability
7 limits.

8 Is Southwestern Bell seeking approval
9 of that tech pub as well or-- we're trying to
10 understand because that is referenced here, and
11 all we are seeking approval today or the
12 Commission is going to be looking at is this
13 tech pub; whereas, the other one is this.

14 MR. SMITH: Mel Smith --

15 MS. MALONE: I am sorry. I want
16 to clarify that. In the June 27th filing that
17 you filed in response to Order No. 13, you said
18 that Southwestern Bell was utilizing Tech Pub
19 76625 and had been since its inception in 1990,
20 and we were curious as to whether or not
21 Southwestern Bell was seeking approval of that
22 tech pub as well since you're required to have
23 all tech pubs approved prior to implementing
24 them.

25 MR. SMITH: Mel Smith. If that's

1 the process, yes. TP 76625 was for a retail DS1
2 and DS3 service implemented in 1990. And its
3 reference here is because for the DS3 UNE loop,
4 we provide electronics. And so the same
5 standards for like percent availability, Bit R,
6 rates that are applicable to our retail DS1 and
7 DS3 service we believe would be applicable to
8 this DS3 UNE. So, yes, we would like to file
9 that also.

10 MS. MALONE: And we can come back
11 after our specific questions to the tech pub at
12 issue, 76860, and talk about additional tech
13 pubs that may need approval. We will get back
14 to that in a few minutes.

15 MR. RAJAGOPAL: In several
16 sections of Tech Pub 76860 -- for example,
17 Section 4.1 at Page 19 and 4.2 at Page 20 --
18 there are tables for the characteristics of a
19 two-wire analog loop and a four-wire analog
20 loop, and there are similar tables across this
21 tech pub.

22 There are some references to the ANSI
23 or Bellcore documents in these tables. The
24 other columns have certain other specifications.
25 Are these Southwestern Bell-specific

1 specifications, or where did these
2 specifications come from, those that are not
3 there for the TRs?

4 MR. SMITH: Could you give me an
5 example, please, sir?

6 MR. RAJAGOPAL: Let's look at Page
7 No. 9, which is also handwritten as Page No. 19.
8 And under 4.1, you have technical parameters for
9 two-wire analog loop. Under that you have the
10 single-frequency generation standard. You have
11 the standards for DC resistance. You have the
12 standards for the type of applied signals. And
13 whereas in an instance where the maximum applied
14 signal and voltages are described, you make
15 references to the ANSI publications. Where did
16 the other numbers come from?

17 MR. SMITH: Mel Smith. The
18 numbers like 8dB and 5dB up at the top, that
19 defines that UNE product, the maximum loss for
20 that particular UNE loop. They can order it as
21 8dB or 5dB that's conditioned with respect to
22 putting amplification equipment on it.

23 The Three Tone Slope figures come from
24 the Telcordia standard. I believe it is
25 GR 000342, if I'm not mistaken, but it comes

1 from a Telcordia standard, the Three Tone Slope
2 figures for access -- two-wire access voice
3 grade service.

4 MR. RAJAGOPAL: So in essence, we
5 could actually replace that be referencing the
6 Telcordia?

7 MR. SMITH: Yes.

8 MR. RAJAGOPAL: What about the DC
9 resistance?

10 MR. SMITH: That's the current
11 revised resistance design rules, also published
12 in Telcordia standards.

13 MR. RAJAGOPAL: Thank you. That's
14 all I have.

15 MR. SRINIVASA: C-Message Noise.

16 MR. SMITH: Mel Smith. That also
17 comes from the Telcordia standard for an
18 access --

19 MR. SRINIVASA: Is that Bellcore.

20 MR. SMITH: Yes.

21 MR. SRINIVASA: They changed their
22 name. It use to be --

23 MR. SMITH: Used to be Bellcore,
24 now Telcordia.

25 MR. SRINIVASA: Do you know the

1 Substantive Rule has a different standard, but
2 this is something -- C-Message Noise is a
3 metallic noise is essentially what this one is.
4 Correct?

5 MR. SMITH: It's noise within the
6 voice band, yes.

7 MR. SRINIVASA: Again, you are
8 getting this from the Bellcore or Telcordia
9 standard?

10 MR. SMITH: Yes, sir.

11 MR. SRINIVASA: Can you give a
12 reference to that one also, where you got that
13 from? We don't mind having this 30 dBR NCO.
14 But if you obtained that from some other
15 standard document, can you make a reference to
16 it?

17 MR. SMITH: Yes, I can give you
18 the exact document in a moment. I have it in
19 the box.

20 MR. SRINIVASA: Okay. How about
21 besides these there are (inaudible) return loss,
22 notched noise, in post noise limits, and also
23 there are certain criteria for balance, okay?

24 MR. SMITH: Yes.

25 MR. SRINIVASA: Apparently, you do

1 have a Three Tone Slope. That's also Bellcore
2 standard. That's what you're using in here,
3 right?

4 MR. SMITH: Mel Smith, yes, sir.
5 Now, I must admit that part of this -- in fact,
6 this particular table was already in the
7 document when I inherited it back in April 16th,
8 1998. So I'm not sure why certain technical
9 things weren't put in there, but this was as the
10 UNE product was designed at that time with these
11 particular technical parameters.

12 MR. SRINIVASA: The reason why I
13 was referring to that is if you are obtaining
14 that from a Telcordia or Bellcore standard,
15 those standards also go back into not only these
16 (inaudible) but Bellcore has a standard for that
17 also. You may want to refer back to all those
18 standards as it relates to the loop because this
19 is only a subset.

20 MR. SMITH: Correct.

21 MS. MALONE: Let's turn to Page 19
22 of the tech pub. It's Section 7.4, and there's
23 a table on this page. Under the line,
24 Applicable Technical References, it references
25 the Bellcore document, TR-NWT-000054, Issue 2,

1 February 1993. And in Southwestern Bell's June
2 27th filing when Staff requested a copy of Issue
3 No. 2, dated February 1993, it said it was no
4 longer available and that the correct reference
5 would be GR-54-CORE. Would Southwestern Bell be
6 agreeable to revising the tech pub to refer to
7 the correct document?

8 MR. SMITH: Mel Smith. Yes, we
9 can do that. Telcordia changed the references
10 to those, and, for instance, now they're called
11 FRs, a family of technical references, but we
12 can put that as the GR version.

13 MS. MALONE: Okay.

14 MR. CURRY: What we would want,
15 presumably, would be whatever is the most recent
16 version. I mean if -- the most --

17 MS. MALONE: What is the most
18 accurate reference to the document you're
19 actually referring to.

20 MR. CURRY: Right. If it's FR, if
21 it's GR, whatever the reference is.

22 MR. SMITH: Okay. If you mind,
23 that's continuously changing.

24 MR. CURRY: Well, at least for the
25 time that this is approved it would be nice for

1 it to be in conformance.

2 MR. SRINIVASA: Let me ask you:

3 GR stands for General Requirements, TR is

4 Technical Requirements that will be more

5 specific. General is just a general

6 guideline -- Is that correct? -- in any of the

7 documents that has GR?

8 MR. SMITH: Mel Smith. I believe

9 that's correct. Although the information in the

10 TR is included in the GR. It's just the current

11 naming convention by Telcordia for the technical

12 document. And now they're moving to FRs.

13 MS. MALONE: I would be interested

14 in whichever R is the correct version and is

15 accessible to anyone who would actually be

16 utilizing this tech pub. So whatever the

17 correct one is is what we would want in the

18 document.

19 MR. SMITH: Okay.

20 MS. MALONE: And similarly, with

21 the Bellcore documents, INS-000342 that's

22 referenced, and that is another issue of a

23 document that is currently unavailable, and, if

24 we could get the correct reference in there,

25 that would be great.

1 Turning back to Page 17, it's pretty
2 much the same issue where we're looking at the
3 applicable technical reference, and this one was
4 a bit more interesting because in the tech pub
5 it says Issue 2 was dated January 1993, and, in
6 the June 27th filing, it says Issue 2 is January
7 1991. But, whatever the case, we need that to
8 be the correct reference. I'm not sure if Issue
9 2 is the current issue or not. And so that's
10 another --

11 MR. SRINIVASA: Apparently,
12 two-wire digital loop, 160 kilobytes per second
13 technical parameters, what we are looking for is
14 the national ISDN 2. I think it came later than
15 '93. Can you confirm that?

16 MR. SMITH: Mel Smith. I do have
17 several NCR Telcordia technical references to
18 ISDN standards for the equipment.

19 MR. SRINIVASA: How about for the
20 two-wire digital loop 160 kilobytes per second
21 technical parameter? You may have line
22 extenders or repeaters that are probably
23 contained in the loop specifications also, line
24 extenders, regenerators.

25 MR. SMITH: Mel Smith, yes, we do.

1 MR. SRINIVASA: You may want to
2 reference to the appropriate latest national
3 ISDN 2 standard for that. I think it's even
4 later than '93. Can you verify it?

5 MR. SMITH: I can check with
6 Telcordia and answer to see if there's an
7 additional technical document that's other than
8 the ones that we've already identified, yes.
9 Like I said, I've got about three of them.

10 MR. SRINIVASA: Make references to
11 those in this.

12 MS. MALONE: Okay, moving on, Page
13 7, looking at Section 3 loop technology upgrades
14 and rearrangement. In light of our pleasant
15 discussion this morning, I read this section and
16 thought that possibly it would be best to add
17 some sort of language -- and I'm flexible on the
18 actual verbiage, we can negotiate on that -- but
19 something to the effect that if the change or
20 upgrade of the loop facilities would have a
21 competitive impact, Southwestern Bell would
22 notify the Commission. Could I get your
23 feelings on that?

24 MS. CHAPMAN: I'm sorry. Which
25 section was this?

1 MS. MALONE: Section 3.0, the
2 first paragraph.

3 MR. SIEGEL: When you refer to
4 identify, are you simply just looking for a
5 Commission notice or Commission approval before
6 the activity goes forward?

7 MR. CURRY: At this point we were
8 only looking at notification so that we would be
9 forewarned if Richardson-type issues would come
10 up that we would need to get the parties back in
11 to discuss them or at least be aware that
12 parties were out there discussing this type of
13 thing.

14 MR. SIEGEL: Would the request
15 possibly be best to have notice at least a known
16 amount of time beforehand so that -- kind of
17 like the Commission has with informational
18 tariff filings, so, you know, notice is in 30
19 days ahead. A CLEC might be able to file a
20 complaint if they deem it appropriate before it
21 actually is already in place and the roads
22 aren't dug up as we learned this morning. That
23 could be of concern.

24 MR. CURRY: And the tariff example
25 is the one I was thinking back to whenever I

1 suggested that we might want to look at language
2 that would say that if it's expected to have a
3 competitive impact, that we would be notified.
4 A time interval would be good. I don't have a
5 particular one in mind, but if when y'all
6 provide language -- as we'll go through here in
7 a few minutes, when you provide language back to
8 us, if you would put a time interval in there.

9 MS. CHAPMAN: I just wanted to
10 clarify. This is Carol Chapman with
11 Southwestern Bell. Would you be expecting us to
12 provide some sort of notification generally if
13 we were planning to deploy a new technology like
14 a new DLC system or something of that nature, or
15 anytime we're going to, you know, put in
16 additional, add additional loops using an
17 existing technology that we've already got in
18 the network? Because the way this is worded, it
19 could read either way.

20 So I just wanted to know exactly what
21 you were looking for.

22 MR. CURRY: I think what we're
23 interested in is the reconfiguration of
24 facilities that would have an impact on
25 competitors. We're not looking for addition of

1 existing architectures that -- whether they do
2 or do not have an impact. But if it's a -- if
3 it's a new architecture that does have or is
4 expected that it may have an impact on
5 competitors' services, then that's what we would
6 think that notification would be good.

7 MS. CHAPMAN: I think we can
8 definitely agree to providing notification on a
9 new architecture of that nature. I just want to
10 make sure every time we did some sort of plant
11 work that we didn't have to try to evaluate it.
12 That's all I wanted to avoid, but that's
13 reasonable.

14 MS. MALONE: Next Page 4 of the
15 tech pub, I had just a general question. I know
16 that this tech pub is specifically for Texas and
17 in the other states there's the TP 76860 MOKA,
18 and are there any significant differences
19 between the two tech pubs?

20 MR. SMITH: At the time this was
21 created, the only significant difference was the
22 DSL section. As a result of the arbitration
23 awards, this tech pub was created to reflect
24 that. Whereas, the MOKA version was not
25 changed.

1 MS. MALONE: Looking at the first
2 paragraph on Page 4, third line down, first new
3 sentence, "Southwestern Bell reserves the right
4 to revise this document for any reason." We
5 would like to propose adding language that says
6 something to the effect that subject to the
7 approval of the FCC or the PUC since according
8 to the FCC order all tech pubs must be approved
9 by the FCC or a state commission.

10 MR. SMITH: Mel Smith. I'll make
11 that change.

12 MS. MALONE: And then the
13 second-to-the-last paragraph, I just wanted some
14 clarification on that. I wasn't exactly sure of
15 your intent. I'm assuming that you reserve the
16 right to the extent that applicable laws and
17 regulations allow you to --

18 MR. LEAHY: This is Tim Leahy with
19 Southwestern Bell. It's not the intent of the
20 Company or this portion of the document to in
21 any way replace or alter our obligations under
22 federal, state law or regulation or orders.

23 MS. MALONE: Would you be willing
24 to add just a clause at the end of that
25 sentence?

1 MR. LEAHY: Yeah, subject to
2 federal/state law, orders, regulations.

3 MS. MALONE: That would be
4 perfect.

5 Those were our specific concerns with
6 the tech pub. And as you can see, we will,
7 obviously, need you to make some revisions and
8 refile something. My line of thinking was we
9 would do that and then at which point we would
10 give CLECs an opportunity to comment again since
11 the previous comment cycle seemed to not work
12 out as planned.

13 So before we set up a time line, I
14 wanted to kind of go over some additional tech
15 pubs. I know we've identified TP 76625, that's
16 a tech pub that's referenced in the technical
17 publication that we're actually talking about
18 today, 76860 TX.

19 And I believe Mr. Smith said that we
20 would -- that Southwestern Bell would request
21 approval of that tech pub as well. Are there
22 any other technical publications that
23 Southwestern Bell is currently utilizing or has
24 implemented?

25 MR. SMITH: Mel Smith. Yes.

1 There's a list of some 15 to 25 technical pubs
2 that have been created in Southwestern Bell over
3 the years.

4 MS. MALONE: Do you know if all of
5 those are currently implemented? Or, I mean,
6 are some outdated and you just have them?

7 MR. SMITH: I would imagine some
8 of them are probably outdated. But we would
9 have to go on an individual case basis and
10 research it to find out if we're still offering
11 those products. I would say 99 percent of them
12 are for retail offerings.

13 MS. MALONE: Okay.

14 MR. SMITH: So I would have to
15 check with marketing to make sure we're still
16 offering those products.

17 MS. MALONE: Do you know of any
18 other technical publications that deal
19 specifically with DSL?

20 MR. SMITH: No, I don't.

21 MS. MALONE: I have a chart that
22 was provided, I believe, in a previous DSL
23 working group, and it lists some technical
24 publications on here. And I would assume that
25 they're just not being used, but I kind of want